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February 12, 2008

Carnegie Telephone Company  
P O Box 86  
Carnegie, OK 73015-0096

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, DC 20554

RE: EB Docket No.06-36

Via: ECFS

Dear Secretary Dortch:

Pursuant to 47 CFR 64.2009(e); please find the accompanying annual CPNI certification and statement for calendar year 2007 for Carnegie Telephone Company form 499 filer ID number 803595.

Should you have any questions regarding this filing, please direct them to the undersigned.

Best Regards

A handwritten signature in blue ink that reads "Keith Gile". The signature is fluid and cursive.

Keith Gile  
Consultant

Cc:

Byron McCoy, Telecommunications Consumer Division, Enforcement Bureau via email  
[byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)

Best Copy Printing via email [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 11, 2008

Name of company covered by this certification: Carnegie Telephone Company

Form 499 Filer ID: 803595

Name of signatory: Lyn D. Johnson

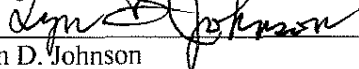
Title of signatory: CPNI Compliance Officer

I, Lyn D. Johnson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed   
Lyn D. Johnson  
Compliance Officer

**Carnegie Telephone Company, Inc.**  
**STATEMENT OF COMPLIANCE WITH CPNI**  
**47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011**  
**EB Docket No. 06-36**

Carnegie Telephone Company, Inc. (Carnegie) has established operating procedures that ensure compliance with the Federal Communication Commission regulations regarding the protection of consumer proprietary network information (CPNI).

- Carnegie has implemented internal procedures to educate and train employees about CPNI and the disclosure of CPNI. Carnegie has established disciplinary procedures for any employee that wrongfully discloses CPNI.
- Carnegie does not use CPNI without customer notification as set forth by the FCC in 47 U.S.C. §222, and 47 C.F.R. § 64.2001- 64.2011. Carnegie provides either an opt-in notice or an opt-out notice when appropriate and maintains the customers choice. Therefore, the customers approval status can be determined prior to use of CPNI.
- Carnegie maintains records of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. Also, Carnegie does not currently allow access to third parties for marketing purposes but will obtain Op in approval from customers for which it may allow third party access. Carnegie will maintain records anytime third parties are allowed access to CPNI. Records of their own marketing, thier affiliate's marketing or any third party relase, include a description of each campaign, the specific CPNI that was used, and what products and services were offered. These records are retained for a period of at least one year.
- Carnegie requires sales personnel to obtain supervisory approval of all outbound marketing requests for customer approval and maintains records of compliance for at least one year.
- Carnegie will provide written notice within five business days to the FCC any instance where the opt-out methods do not work properly, to such a degree that the customers inability to opt-out is more than an anomaly.